

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

**NOVEMBER 2014 GRAND JURY
(Impaneled November 7, 2014)**

THE UNITED STATES OF AMERICA INDICTMENT

-vs-

DAVID YOUNG

Violations:
Title 18, United States Code,
Sections 2251(a) and 2252A(a)(5)(B)
(2 Counts and Forfeiture Allegation)

COUNT 1

(Production of Child Pornography)

The Grand Jury Charges That:

On or about May 28, 2014, the exact date being unknown to the Grand Jury, in the Western District of New York, the defendant, **DAVID YOUNG**, did knowingly employ, use, persuade, entice, and coerce a minor, that is, Victim 1, a person known to the Grand Jury, who was less than 18 years old, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 2

(Possession of Child Pornography)

The Grand Jury Further Charges That:

On or about February 13, 2015, in the Western District of New York, the defendant, **DAVID YOUNG**, did knowingly possess material, that is, a Hewlett Packard Pavilion G6-2249WM laptop computer bearing serial number 5CD3042DK8, that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, that had been produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

As a result of committing either of the offenses alleged in this Indictment, the defendant, **DAVID YOUNG**, shall forfeit to the United States all property, real and personal, involved in the offense of conviction, and all property traceable to such property including but not limited to the following:

- a. Hewlett Packard Pavilion G6-2249WM laptop computer bearing serial number 5CD3042DK8.

All pursuant to the provisions of Title 18, United States Code, Section 2253.

DATED: Buffalo, New York, May 13, 2015.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

S/FOREPERSON